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**SPECIAL COUNSEL FOR ROBIN PHELAN,
 CHAPTER 11 TRUSTEE**

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 DALLAS DIVISION**

IN RE:

ACIS CAPITAL MANAGEMENT, L.P.,
 ACIS CAPITAL MANAGEMENT GP, LLC,

Debtors.

§
 § CHAPTER 11 CASES
 §
 § CASE NO. 18-30264-sgj11
 § (Jointly Administered)
 §
 §

MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING

1. Robin Phelan (the “Trustee”), as Chapter 11 Trustee for Acis Capital Management, L.P. and Acis Capital Management GP, LLC (together, the “Debtors”), hereby requests that an expedited hearing be set on the *Chapter 11 Trustee’s Motion for Entry of Order (A) Conditionally Approving Disclosure Statement; (B) Scheduling Combined Hearing on Final Approval of Disclosure Statement and Confirmation of Plan, and Setting Related Deadlines; (C) Approving Forms for Voting and Notice; and (D) Granting Related Relief* (the “Motion”) [Docket No. 407] on July 18, 2018 at 1:30 p.m. The Trustee estimates that 30 minutes will be required for the hearing.

2. The Trustee has filed a *Joint Plan for Acis Capital Management, L.P. and Acis Capital Management GP, LLC* (the “Plan”) [Docket No. 383] and *Disclosure Statement Pursuant to Section 1125 of the United States Bankruptcy Code with Respect to the Joint Plan for Acis Capital Management, L.P. and Acis Capital Management GP, LLC* (the “Disclosure Statement”) [Docket No. 405]. The Plan proposes three separate reorganization alternatives which are identified in the Plan as “Plan A,” “Plan B” and “Plan C.” Plan A contemplates closing of a transaction with Oaktree Capital Management, L.P. (“Oaktree”) as the “Plan Funder,” or closing of a similar transaction with a different Plan Funder in the event that a third party submits a qualified proposal that is determined to be superior to Oaktree’s proposal. Pursuant to a

Commitment Letter executed by the Trustee, as subsequently modified, Oaktree's commitment to the proposed transaction contemplated by Plan A of the Plan will terminate on August 24, 2018 if the transaction documents have not been executed and delivered and all other conditions of the transaction have not been satisfied or waived. Therefore, the Trustee must obtain conditional approval of the Disclosure Statement and promptly solicit votes on the Plan to have an opportunity to seek confirmation of the Plan and close the proposed transaction prior to termination of Oaktree's commitment.

3. A hearing was not requested earlier because (a) Court approval of an expense reimbursement and break-up fee in favor of Oaktree – both of which were essential inducements and conditions to Oaktree's entering into and continuing obligations under the Commitment Letter – was not granted until a hearing held on July 6, 2018 and subsequent entry of an Order [Docket No. 390] on July 10, 2018, and (b) the Disclosure Statement was not filed until July 13, 2018.

4. The Trustee will provide notice of the proposed expedited hearing to the parties reflected on the certificate of service included in the Motion. This notice will be sufficient because the parties to receive notice are those parties most likely to have an interest in this matter.

Dated: July 13, 2018.

Respectfully submitted,

/s/ Jeff P. Prostok

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